

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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JACQUELINE GOMEZ and YASHIRA  
CARRASCO, individually, and on behalf of all others  
similarly situated,

Plaintiffs,

- against -

LACE ENTERTAINMENT, INC. d/b/a LACE  
GENTLEMEN'S CLUB, MLB ENTERPRISES,  
CORP., d/b/a LACE GENTLEMEN'S CLUB, MLB  
ENTERPRISES CORP., ANTHONY CAPECI and  
GLEN ORECCHIO,

Defendants.  
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Case No. 15-CV-3326 (CM) (KNF)

Civil Action

**NOTICE OF MOTION**  
**ELECTRONICALLY FILED**

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION OF LACE ENTERTAINMENT, INC. IN SUPPORT OF  
ITS MOTION TO DISMISS, AND LIMITED OPPOSITION TO THE  
MOTION TO COMPEL ARBITRATION**

**PLEASE TAKE NOTICE** that defendant, Lace Entertainment, Inc. ("LEI") will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order granting its motion to dismiss, or, in the alternative, in opposition to only that portion of Defendants MLB Enterprises, Inc. and Anthony Capeci's motion to compel arbitration to the extent it could be construed to compel LEI to arbitrate pursuant to Fed. R. Civ. P. 12(b)(6) for Plaintiff's failure to state a claim upon which relief can be granted, upon the accompanying declaration, and brief.

DATED: New York, New York  
July 8, 2015

Respectfully submitted,  
  
COLE SCHOTZ, P.C.

By: /s/ Leo V. Leyva  
Leo V. Leyva  
Jed M. Weiss  
Attorneys for Lace Entertainment, Inc.  
Cole Schotz P.C.  
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(212) 752-8000

**CERTIFICATE OF SERVICE**

I hereby certify that an exact copy of the foregoing Notice was provided via the Court's electronic filing system (CM/ECF) to all counsel of record, including counsel for Plaintiffs, on the 8<sup>th</sup> day of July, 2015.

/s/ Jed M. Weiss

JED M. WEISS

Attorneys for Lace Entertainment, Inc.